

# **Exhibit 3**

**Subject:** Re: UCT v. LGL (2:23-cv-449) – Lenovo's Suppl. Discovery Responses & Document Productions  
**Date:** Friday, October 25, 2024 at 10:45:52 AM Central Daylight Time  
**From:** Seth Hasenour  
**To:** Marshall, Steve, Ashley Ratycz, Abrishami, Danute, melissa@gillamsmithlaw.com, lenovo-uct-wfg@willkie.com, Diana Arias, Lenovo-UCT-Cov  
**CC:** UCT Counsel, Moore, Steve, Mudd, Jason (SHB), Lee, Josh, cleah@kilpatricktownsend.com, kkoballa@kilpatricktownsend.com  
**Attachments:** image001.png, image002.png

Counsel,

We have still not received any response regarding our request to meet and confer today. If Lenovo does not provide a date certain by which it will address each of the deficiencies in LGL's supplemental interrogatory responses today, we will have no choice but to raise Lenovo's non-compliance with the Court and seek sanctions in a motion to be filed on Monday.

Regards,  
Seth

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**From:** "Marshall, Steve" <[SMarshall@cov.com](mailto:SMarshall@cov.com)>  
**Date:** Thursday, October 24, 2024 at 9:16 AM  
**To:** Ashley Ratycz <[ARatycz@bclgpc.com](mailto:ARatycz@bclgpc.com)>, "Abrishami, Danute" <[dabrishami@cov.com](mailto:dabrishami@cov.com)>, "[melissa@gillamsmithlaw.com](mailto:melissa@gillamsmithlaw.com)" <[melissa@gillamsmithlaw.com](mailto:melissa@gillamsmithlaw.com)>, "[lenovo-uct-wfg@willkie.com](mailto:lenovo-uct-wfg@willkie.com)" <[lenovo-uct-wfg@willkie.com](mailto:lenovo-uct-wfg@willkie.com)>, Diana Arias <[Diana@gillamsmithlaw.com](mailto:Diana@gillamsmithlaw.com)>, Lenovo-UCT-Cov <[Lenovo-UCT-Cov@cov.com](mailto:Lenovo-UCT-Cov@cov.com)>  
**Cc:** UCT Counsel <[UCT\\_Counsel@bc-lawgroup.com](mailto:UCT_Counsel@bc-lawgroup.com)>, Seth Hasenour <[shasenour@bclgpc.com](mailto:shasenour@bclgpc.com)>, "Moore, Steve" <[smoore@ktslaw.com](mailto:smoore@ktslaw.com)>, "Mudd, Jason (SHB)" <[jmudd@shb.com](mailto:jmudd@shb.com)>, "Lee, Josh" <[JLee@ktslaw.com](mailto:JLee@ktslaw.com)>, "[cleah@kilpatricktownsend.com](mailto:cleah@kilpatricktownsend.com)" <[cleah@kilpatricktownsend.com](mailto:cleah@kilpatricktownsend.com)>, "[kkoballa@kilpatricktownsend.com](mailto:kkoballa@kilpatricktownsend.com)" <[kkoballa@kilpatricktownsend.com](mailto:kkoballa@kilpatricktownsend.com)>  
**Subject:** RE: UCT v. LGL (2:23-cv-449) – Lenovo's Suppl. Discovery Responses & Document Productions

Ashley,

I've copied the Kilpatrick team. Covington intends to withdraw from the case today.

Thanks,  
Steve

**Steve Marshall**

Covington & Burling LLP  
One CityCenter, 850 Tenth Street, NW  
Washington, DC 20001-4956  
T +1 202 662 5558 | [smarshall@cov.com](mailto:smarshall@cov.com)  
[www.cov.com](http://www.cov.com)

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**From:** Ashley Ratycz <[ARatycz@bclgpc.com](mailto:ARatycz@bclgpc.com)>  
**Sent:** Thursday, October 24, 2024 10:11 AM  
**To:** Marshall, Steve <[SMarshall@cov.com](mailto:SMarshall@cov.com)>; Abrishami, Danute <[dabrishami@cov.com](mailto:dabrishami@cov.com)>; [melissa@gillamsmithlaw.com](mailto:melissa@gillamsmithlaw.com); [lenovo-uct-wfg@willkie.com](mailto:lenovo-uct-wfg@willkie.com); Diana Arias <[Diana@gillamsmithlaw.com](mailto:Diana@gillamsmithlaw.com)>; Lenovo-UCT-Cov <[Lenovo-UCT-Cov@cov.com](mailto:Lenovo-UCT-Cov@cov.com)>  
**Cc:** UCT Counsel <[UCT\\_Counsel@bc-lawgroup.com](mailto:UCT_Counsel@bc-lawgroup.com)>; Seth Hasenour <[shasenour@bclgpc.com](mailto:shasenour@bclgpc.com)>  
**Subject:** Re: UCT v. LGL (2:23-cv-449) – Lenovo's Suppl. Discovery Responses & Document Productions

**[EXTERNAL]**

Counsel,

I am following up again on the correspondence below regarding Lenovo's deficient interrogatory responses. UCT intends to raise Lenovo's non-compliance with the Court and seek sanctions. Please provide your availability for a meet and confer tomorrow to discuss.

Best,  
Ashley

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**From:** Ashley Ratycz <[ARatycz@bclgpc.com](mailto:ARatycz@bclgpc.com)>  
**Date:** Tuesday, October 22, 2024 at 9:59 AM  
**To:** Marshall, Steve <[SMarshall@cov.com](mailto:SMarshall@cov.com)>, Abrishami, Danute <[dabrishami@cov.com](mailto:dabrishami@cov.com)>, [melissa@gillamsmithlaw.com](mailto:melissa@gillamsmithlaw.com) <[melissa@gillamsmithlaw.com](mailto:melissa@gillamsmithlaw.com)>, [lenovo-uct-wfg@willkie.com](mailto:lenovo-uct-wfg@willkie.com) <[lenovo-uct-wfg@willkie.com](mailto:lenovo-uct-wfg@willkie.com)>, Diana Arias <[Diana@gillamsmithlaw.com](mailto:Diana@gillamsmithlaw.com)>, Lenovo-UCT-Cov <[Lenovo-UCT-Cov@cov.com](mailto:Lenovo-UCT-Cov@cov.com)>  
**Cc:** UCT Counsel <[UCT\\_Counsel@bc-lawgroup.com](mailto:UCT_Counsel@bc-lawgroup.com)>, Seth Hasenour <[shasenour@bclgpc.com](mailto:shasenour@bclgpc.com)>  
**Subject:** Re: UCT v. LGL (2:23-cv-449) – Lenovo's Suppl. Discovery Responses & Document Productions

Counsel,

I am following up on my email below. Please confirm by the EOB today whether and when LGL will be addressing the identified deficiencies. Alternatively, please provide your availability for a meet and confer tomorrow or Thursday to discuss UCT's next steps in obtaining such information.

Best,  
Ashley

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**From:** Ashley Ratycz <[ARatycz@bclgpc.com](mailto:ARatycz@bclgpc.com)>

**Date:** Wednesday, October 16, 2024 at 10:29 AM

**To:** Marshall, Steve <[SMarshall@cov.com](mailto:SMarshall@cov.com)>, Abrishami, Danute <[dabrishami@cov.com](mailto:dabrishami@cov.com)>, [melissa@gillamsmithlaw.com](mailto:melissa@gillamsmithlaw.com) <[melissa@gillamsmithlaw.com](mailto:melissa@gillamsmithlaw.com)>, [lenovo-uct-wfg@willkie.com](mailto:lenovo-uct-wfg@willkie.com) <[lenovo-uct-wfg@willkie.com](mailto:lenovo-uct-wfg@willkie.com)>, Diana Arias <[Diana@gillamsmithlaw.com](mailto:Diana@gillamsmithlaw.com)>, Lenovo-UCT-Cov <[Lenovo-UCT-Cov@cov.com](mailto:Lenovo-UCT-Cov@cov.com)>

**Cc:** UCT Counsel <[UCT\\_Counsel@bc-lawgroup.com](mailto:UCT_Counsel@bc-lawgroup.com)>, Seth Hasenour <[shasenour@bclgpc.com](mailto:shasenour@bclgpc.com)>

**Subject:** Re: UCT v. LGL (2:23-cv-449) – Lenovo's Suppl. Discovery Responses & Document Productions

Counsel,

We write regarding several deficiencies in LGL's supplemental interrogatory responses, particularly, with respect to the disclosures in Appendix A. Though our investigation and review is ongoing, we have identified at least the following deficiencies:

1. Appendix A improperly omits any Intel platform products. We need LGL to identify all the non-Intel supplied components for products that include Intel chips. For example, we need LGL to identify any NVIDIA or TI components in the products regardless of whether the product includes an Intel chip
2. Appendix A does not list the "DisplayPort Supplier/Controller" for a lot of products that support DisplayPort and includes "N/A" in certain cells
3. Appendix A has some empty cells for PCIe or USB support
4. Appendix A has some empty cells for "Project Name"
5. For Qualcomm, we need the Qualcomm software Build IDs for each product
6. Appendix A "Monitors" Tab has empty cells for almost all the "DisplayPort Controllers" and some of the entries for the "USB/PD Controller" are empty
7. Appendix A does not identify the relevant model numbers for AMD and MediaTek

Please confirm that LGL will address these deficiencies as soon as possible.

Best,  
Ashley

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**From:** Marshall, Steve <[SMarshall@cov.com](mailto:SMarshall@cov.com)>

**Date:** Monday, October 14, 2024 at 4:21 PM

**To:** Seth Hasenour <[shasenour@bclgpc.com](mailto:shasenour@bclgpc.com)>, Abrishami, Danute <[dabrishami@cov.com](mailto:dabrishami@cov.com)>

**Cc:** [melissa@gillamsmithlaw.com](mailto:melissa@gillamsmithlaw.com) <[melissa@gillamsmithlaw.com](mailto:melissa@gillamsmithlaw.com)>, Diana Arias <[Diana@gillamsmithlaw.com](mailto:Diana@gillamsmithlaw.com)>, UCT Counsel <[UCT\\_Counsel@bc-lawgroup.com](mailto:UCT_Counsel@bc-lawgroup.com)>, [lenovo-uct-wfg@willkie.com](mailto:lenovo-uct-wfg@willkie.com) <[lenovo-uct-wfg@willkie.com](mailto:lenovo-uct-wfg@willkie.com)>, Lenovo-UCT-Cov <[Lenovo-UCT-Cov@cov.com](mailto:Lenovo-UCT-Cov@cov.com)>

**Subject:** RE: UCT v. LGL (2:23-cv-449) – Lenovo's Suppl. Discovery Responses & Document Productions

Seth,

Yes, that's fine.

Thanks,  
Steve

## Steve Marshall

Covington & Burling LLP  
One CityCenter, 850 Tenth Street, NW  
Washington, DC 20001-4956  
T +1 202 662 5558 | [smarshall@cov.com](mailto:smarshall@cov.com)  
[www.cov.com](http://www.cov.com)

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**From:** Seth Hasenour <[shasenour@bclgpc.com](mailto:shasenour@bclgpc.com)>  
**Sent:** Monday, October 14, 2024 4:00 PM  
**To:** Abrishami, Danute <[dabrishami@cov.com](mailto:dabrishami@cov.com)>; Marshall, Steve <[SMarshall@cov.com](mailto:SMarshall@cov.com)>  
**Cc:** [melissa@gillamsmithlaw.com](mailto:melissa@gillamsmithlaw.com); Diana Arias <[Diana@gillamsmithlaw.com](mailto:Diana@gillamsmithlaw.com)>; UCT Counsel <[UCT\\_Counsel@bc-lawgroup.com](mailto:UCT_Counsel@bc-lawgroup.com)>; [lenovo-uct-wfg@willkie.com](mailto:lenovo-uct-wfg@willkie.com); Lenovo-UCT-Cov <[Lenovo-UCT-Cov@cov.com](mailto:Lenovo-UCT-Cov@cov.com)>  
**Subject:** Re: UCT v. LGL (2:23-cv-449) – Lenovo's Suppl. Discovery Responses & Document Productions

**[EXTERNAL]**

Hi Steve,

With respect to Lenovo's identification of component model numbers in its supplemental interrogatory responses, please confirm we have Lenovo's permission to disclose the identified model numbers to the counsel retained to handle the respective subpoenas UCT has served (e.g., that we may disclose the identified AMD model numbers to AMD's counsel handling the subpoena to AMD).

Thanks,  
Seth

---

**From:** "Abrishami, Danute" <[dabrishami@cov.com](mailto:dabrishami@cov.com)>  
**Date:** Friday, October 11, 2024 at 9:46 PM  
**To:** Ashley Ratycz <[ARatycz@bclgpc.com](mailto:ARatycz@bclgpc.com)>, Brett Cooper <[bcooper@bclgpc.com](mailto:bcooper@bclgpc.com)>, "[kurt@truelovelawfirm.com](mailto:kurt@truelovelawfirm.com)" <[kurt@truelovelawfirm.com](mailto:kurt@truelovelawfirm.com)>, Seth Hasenour <[shasenour@bclgpc.com](mailto:shasenour@bclgpc.com)>, Drew Hollander <[dhollander@bclgpc.com](mailto:dhollander@bclgpc.com)>, Jonathan Yim

<jyim@bclgpc.com>

Cc: "melissa@gillamsmithlaw.com" <melissa@gillamsmithlaw.com>, Diana Arias <Diana@gillamsmithlaw.com>, UCT Counsel <UCT\_Counsel@bc-lawgroup.com>, "lenovo-uct-wfg@willkie.com" <lenovo-uct-wfg@willkie.com>, Lenovo-UCT-Cov <Lenovo-UCT-Cov@cov.com>

**Subject:** UCT v. LGL (2:23-cv-449) – Lenovo's Suppl. Discovery Responses & Document Productions

Counsel:

Attached for service please find Lenovo's supplemental discovery responses and the link below containing document productions in response to the Court's Order (Dkt. No. 44) in Universal Connectivity Technologies Inc. v. Lenovo Group Limited, No. 2:23-cv-449 (E.D. Tex.).

Please note the Appendix 1 attached hereto has been designated as 'CONFIDENTIAL – ATTORNEYS' EYES ONLY' and should be treaded in accordance with the Protective Order.

Document productions are available at: <https://covington.kiteworks.com/w/f-d7e1c38f-4a29-4c60-a778-2822ea2e1a86>.

- Volume LGL\_UCT\_002 (containing LGL\_UCT\_00059320 – LGL\_UCT\_00082842);
- Volume LGL\_UCT\_003 (containing LGL\_UCT\_00082843 – LGL\_UCT\_00087740); and
- Volume LGL\_UCT\_004 (containing LGL\_UCT\_00087741 – LGL\_UCT\_00089564).

The passwords for each .zip file and Appendix 1 will follow by separate email.

We will supplement the document production, Volume LGL\_UCT\_004, with missing load files next week.

Best regards,  
Danute

**Danute Abrishami**

Senior Patent/ITC Case Manager

Covington & Burling LLP  
One CityCenter, 850 Tenth Street, NW  
Washington, DC 20001-4956  
T +1 202 662 6573 | [dabrishami@cov.com](mailto:dabrishami@cov.com)  
[www.cov.com](http://www.cov.com)

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